

Concurrence

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

999 18TH STREET - SUITE 300

DENVER, CO 80202-2466

Phone 800-227-8917

<http://www.epa.gov/region08>

Ref: EPR-ER

November 22, 2004

ACTION MEMORANDUM AMENDMENT #2

SUBJECT: Request for a second Amendment to the Time Critical Removal Action Memorandum for the Vermiculite Intermountain Site, Salt Lake City/County, Utah.

FROM: Floyd Nichols, On-Scene Coordinator
Emergency Response Team

\$

THROUGH: Paul Peronard, Acting Team Supervisor
Emergency Response Unit

Douglas M. Skie, Director
Preparedness, Assessment & Emergency Response Programs

TO: Max H. Dodson, Assistant Regional Administrator
Office of Ecosystems Protection & Remediation

Site ID#: 08GA

Category of Removal: Time Critical, Fund-Lead

I. PURPOSE

The purpose of this ACTION MEMORANDUM AMENDMENT # 2 is to request an increase in the ceiling for the Removal Action at the Vermiculite Intermountain site (Site) located in Salt Lake City/County, Utah. The original Action Memorandum was signed on April 7, 2004, and included a 12-month & \$2 million exemption from the statutory limits (See Attachment A). The first Action Memorandum Amendment was signed on May 26, 2004 (See Attachment B).

In the process of finding and removing the Libby Amphibole (LA) (asbestos) contamination from the Site, the U.S. Environmental Protection Agency (EPA) Region VIII faced several problems, not the least of which was estimating the full extent of LA contamination at the site.

FOR
EPR-SA
11/18/04

BENF-RC
Kerden
11/23/04

BENF-L
S. Bohan
11/24/04

8 EPR-CA
for
11/21/04



Printed on Recycled Paper

II. SITE CONDITIONS AND BACKGROUND

The Site is located near 333 West 100 South, Salt Lake City, Utah. EPA conducted several sampling events at or around the Site and inside the buildings surrounding the Site during 2002 and 2003. Analysis of the samples showed the presence of Libby Amphibole (LA) asbestos fibers in significant concentrations in on- and off-Site soils and in dust collected from within various building interior work spaces and on equipment units inside buildings that are on and adjacent to the Site.

Original work projections for the Site included excavation and/or removal of approximately 3,900 cubic yards of LA-contaminated dust, soils, and miscellaneous debris from the Site and surrounding properties, including the Utah Power & Light (UPL) electrical substation parcel (including a small, 2-story storage/switch building), the Artistic Printing Company facility, and the Frank Edwards Building (See Attachment 1 - Action Memorandum dated April 7, 2004 for additional information). EPA, with the support and concurrence of the Utah Department of Environmental Quality (UDEQ), determined that imposition of institutional/engineering controls on the adjacent property was the best way to address the trace amounts of LA residues found in a relatively-thin, sub-grade horizon beneath a portion of the Ampco Parking Lot.

EPA-contractors mobilized to the site in April 2004 to initiate this Removal, beginning with cleanup of the Artistic Printing Company facility. After cleanup of the print shop was completed, EPA contractors cleaned and cleared the nearby Frank Edwards Building. Fund-lead portions of the Removal were completed in late summer, after the expenditure of approximately 19,000 contractor labor hours.

In early September, PacifiCorp (UPL parent company) began the PRP-lead phase of this Removal action on the 3rd West Electrical Substation parcel, pursuant to a EPA-PacifiCorp Administrative Order on Consent (AOC). According to terms of the AOC, the PRP was to clean and clear the substation of LA residues according to clearance standards specified by EPA. At the outset of this activity, EPA and PacifiCorp estimated the volume of LA-associated waste contaminating the substation parcel to be less than 4,000 cubic yards. PRP site excavations, to date, have demonstrated this volume estimate to be a gross under-estimate.

PacifiCorp began parcel excavation chartered to chase (excavate and remove) visible LA residues until the parcel had been thoroughly cleaned. At the outset, PacifiCorp, EPA and DEQ anticipated that the PRP needed to do little-more than 'surface-scrape' the site, to an approximate depth of less than 12 inches, to remove the identified LA residues. However, as excavations continued, the PRP encountered ever-increasing volumes of LA residues at depth, including vermiculite ore, exfoliated product, clinkers, flue and process fines, and LA-contaminated soils and rail ballast. To date, the PRP has excavated and removed over 13,000 cubic yards of LA-contaminated residues from the site, digging, in some areas, to a depth of over 14 feet, mostly in the area directly-adjacent to the Ampco Parking Lot. Excavations continue.

Pursuant to the AOC, the scope of PRP cleanup is limited to cleanup of the substation parcel. When the main pit was opened - along the fence separating the electrical

substation and the Ampco parking lot - 'pockets' of visible vermiculite were identified in various subsurface horizons under the fence, indicating that substantial amounts of LA-contaminated residues extend beyond the boundaries of the substation parcel, past the fence, and under the parking lot.

III. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Removal Actions

Consistent with AOC-specified PRP soil removal actions on the electrical substation parcel, EPA will remove the fence now separating the electrical substation and the Ampco Parking Lot so as to continue excavating LA residues from the Site. The OSC currently estimates that as much as an additional 1,500 cubic yards of LA-contaminated residues and soils may need to be removed from the Site for disposal. After LA residues have been removed from the parking lot parcel, the parking lot will be restored to its' original configuration and the electrical substation fence replaced according to UPL-specified requirements.

B. Potential Future Actions

Completion of these additional actions should clear the Site of LA-contaminated residues. Accordingly, we anticipate no future response actions at this Site.

C. Estimated Costs

The current and proposed new cost project ceiling estimate for this Removal is shown below:

Extramural Costs:

	<u>Current Ceiling</u>	<u>Proposed Changes</u>	<u>Proposed Ceiling</u>
<u>Regional Allowance Costs:</u>			
ERRS/State Licensed ACM Sub-contractor	\$1,014,000	\$ 450,000	\$1,464,000
Transportation & Disposal Costs	\$ 15,000	\$ 45,000	\$ 60,000
Volpe IAG (including sampling contractor)	\$ 702,000	\$ -	\$ 702,000
USCG	\$ 30,000	\$ 15,000	\$ 45,000
Contingency (20%)	<u>\$ 351,600</u>	<u>\$ 102,000</u>	<u>\$ 453,600</u>
TOTAL, EXTRAMURAL COSTS	\$2,112,600	\$ 612,000	\$2,724,600

Intramural Costs

EPA's Direct Intramural Costs (10%)	\$ 214,800	\$ 61,200	\$ 276,000
Regional Indirect Cost (35%)	<u>\$ 796,866</u>	<u>\$ 214,200</u>	<u>\$1,011,066</u>
Estimated Total EPA Costs*	\$3,124,266	\$ 887,400	\$4,011,666

*The total EPA costs for this removal action, to be based on full-cost accounting practices, that will be eligible for cost recovery are estimated to be \$4,011,666. Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of the removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of total costs estimates nor deviation of actual costs from this estimate will affect the United States' right to cost recovery.

IV. RECOMMENDATION

This decision document represents the Amended Removal Action for the Vermiculite Intermountain Site, located at 333 West 100 South, Salt Lake City, Utah, developed in accordance with CERCLA as amended, and not inconsistent with the NCP. This decision is based on the Administrative Record for the Site.

Conditions at the Site meet the NCP criteria found at 40 C.F.R. 1 §300.415(b)(2) for a Removal Action, and I recommend your approval. The total project ceiling is estimated to be \$4,011,666 and of this, an estimated \$2,724,600 comes from the Regional removal allowance (\$612,000 from FY 2005).

Approve: _____
Max H. Dodson
Assistant Regional Administrator
Office of Ecosystems Protection
and Remediation

Date: _____

Disapprove: _____
Max H. Dodson
Assistant Regional Administrator
Office of Ecosystems Protection
and Remediation

Date: _____

Attachments:

- Attachment A - Action Memorandum dated April 7, 2004
- Attachment B - Action Memorandum dated May 26, 2004

SUPPLEMENTAL DOCUMENTS

Support/reference documents which may be helpful to the reader and/or have been cited in the report may be found in the Administrative Record File at the Superfund Records Center for Region VIII EPA, 999 18th Street, Denver, Colorado 80202.